

EXHIBIT 52

IN THE COURT OF APPEALS OF THE STATE OF OREGON

ARNAUD PARIS,
Petitioner-Appellant,

and

HEIDI MARIE BROWN,
Respondent-Respondent.

Jackson County Circuit No. 23DR08269

A182305

OBJECTION TO MOET

Respondent Brown objects to the time extension appellant has requested for filing the transcript. Appellant has asked the court for a 122-day extension, claiming that “this case may settle in mediation” and that there is presently a “dialogue between Appellant and Respondent and the French lawyers.” Respondent does not believe there is any possibility of this case settling (last July, respondent absconded with the children to France, in violation of the circuit court's order, and he has thus far refused to return). She is also unaware of any dialog between the parties or the attorneys for the parties, including the parties' French lawyers. She believes that respondent is merely seeking to delay the conclusion of the parties' litigation. This court should not support the delay.

I certify that I filed this notice on January 18, 2024. That same day I sent a copy by first-class mail to: Arnaud Paris, 13 rue Ferdinand Duval, Paris,

France 75004. I also sent a copy to aparis@sysmicfilms.com and
arnaud@skyvr.com.

S/George W. Kelly
George W. Kelly (822980)
Attorney for Heidi Brown